

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DONALD C. HUTCHINS

Plaintiff

v.

CARDIAC SCIENCE, INC., et., al.

Defendants

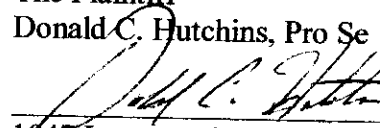
Civil Action: **04-30126-MAP**

**PLAINTIFF'S MOTION FOR REMOVAL PURSUANT TO  
FED. R. CIV. 11 and TITLE 28, PART IV, ¶ 1446 (a), LOCAL RULE 81.1,  
and M.G.L. c. 223, § 5 FORUM NON CONVENIENS**

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2005 DEC 23 P 3:28  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

The Plaintiff, Donald C. Hutchins respectfully requests that this Honorable Court grant Plaintiff a Motion for Removal in Civil Action No. 05 1115, Superior Court, Hampden County, Commonwealth of Massachusetts, in which the Complient Corporation is the Plaintiff and Donald C. Hutchins and the CPR Prompt Corporation are the Defendants. In support thereof and in accordance with Title 28, Part IV, ¶ 1446, 1447 and 1448, the Plaintiff submits the attached Memorandum containing a short and plain statement on the grounds for removal together with a copy of the process served on Hutchins.

The Plaintiff  
Donald C. Hutchins, Pro Se

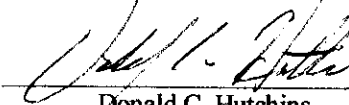
  
1047 Longmeadow Street  
Longmeadow, Massachusetts 01106  
(413) 567-0606

Dated: December 23, 2005

CERTIFICATE OF SERVICE

I, Donald C. Hutchins, 1047 Longmeadow, Massachusetts 01106, hereby certify that I served a copy of the foregoing on the appropriate parties by sending a copy by United States mail to: Randall T. Skaar, Esq. Patterson, Thunte, Skaar & Christensen, P.A., 4800 IDS Center, 80 South 8<sup>th</sup> St. Minneapolis, Minnesota; 55402, Paul H. Rothschild, Esq. Bacon & Wilson, P.C., 33 State St., Springfield, MA 01103; John J. Egan Esq., Egan, Flanagan and Cohen, P.C., 67 Market St., Springfield, MA 01102-9035

Dated: 12/23/05

  
Donald C. Hutchins